

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION**

KARL KENDALL, SUZANNE RAINEY  
and VINCENZO PERNICE, individually and on  
behalf of those similarly situated,

Plaintiffs,

v.

PHARMACEUTICAL PRODUCT  
DEVELOPMENT, LLC, BOARD OF  
DIRECTORS OF PHARMACEUTICAL  
PRODUCT DEVELOPMENT, LLC, THE  
BENEFITS ADMINISTRATIVE COMMITTEE,  
and JOHN DOES 1-30.

Defendants.

Civil Action No. 7:20-cv-00071-D

**JOINT MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR  
PRELIMINARY APPROVAL OF CLASS-ACTION SETTLEMENT  
AND RELATED DOCUMENTS**

In accordance with Local Civil Rule 6.1, Plaintiffs Karl Kendall, Suzanne Rainey, and Vincenzo Pernice (collectively, “Plaintiffs”) and Defendants Pharmaceutical Product Development, LLC, the Board of Directors of Pharmaceutical Product Development, LLC, and The Benefits Administrative Committee (collectively, “Defendants”) request a two-week extension of time for Plaintiffs to file their motion for preliminary approval of class-action settlement and related documents.

On December 1, 2021, at the Parties’ request, the Court stayed all deadlines to allow the Parties to engage in settlement negotiations. (ECF No. 40.) On Wednesday January 26, 2022, the Parties participated in a mediation with David Geronemus (JAMS) and reached a class-wide settlement in principle to resolve all claims in this matter, subject to finalizing the terms in a formal settlement agreement. On January 31, 2022, Plaintiffs requested until Thursday, March 17, 2022,

to submit their motion for preliminary approval of this class-wide settlement and related documents. (*See* ECF No. 41.) Although the Court did not approve or deny Plaintiffs' request for a March 17, 2022 deadline, the Parties have been operating as if March 17, 2022, is Plaintiffs' deadline to file their motion for preliminary approval and related documents.

Since then, the Parties have exchanged the written settlement agreement and related documents to be filed with Plaintiffs' motion. Despite diligent effort, the Parties need additional time to review these documents with their respective clients, revise as appropriate, and confer regarding any revisions. Therefore, the Parties respectfully request that the Court extend Plaintiffs' deadline to file their motion for preliminary approval and related documents from March 17, 2022, to March 31, 2022.

Respectfully submitted, this the 16th day of March, 2022.

**CAPOZZI ADLER, P.C.**

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**CERTIFICATE OF SERVICE**

This is to certify that on this 16th day of March, 2022, I electronically filed the foregoing Joint Motion for Extension of Time with the Clerk of the Court using the CM/ECF system which will send notification of such filing and effectuate service to all counsel of record in this matter.

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